

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

DEFENDANT'S CONSENT MOTION FOR LEAVE
TO FILE REPLY TO THE GOVERNMENT'S OPPOSITION TO THE MOTION TO
SUPPRESS NO LATER THAN MAY 31, 2023

James Meek, through counsel, and with consent of the government, respectfully moves this Court for leave to file his reply to the government's opposition (ECF 60) to the motion to suppress (ECF 53) based on the warrantless seizure of Mr. Meek's accounts pursuant to 18 U.S.C. § 2703(f) no later than noon on May 31, 2023. In support of this motion, Mr. Meek states as follows:

1. Mr. Meek filed several pretrial motions in this case, and the government has filed oppositions to those motions. Mr. Meek's deadline to file replies to these motions is Friday, May 26, 2023.
 2. Mr. Meek seeks a short extension to file his reply to ECF 60. Given the number of arguments the government has raised in its opposition, as well as the novel nature of the issues involved, and the need to file several other reply briefs, Mr. Meek seeks a short extension solely on this reply to ECF 60.
 3. The government does not oppose Mr. Meek's request, and Mr. Meek respectfully submits that a thorough briefing will assist the Court in its decisional process on this Constitutional argument. The short continuance requested will leave the government and the Court with ample time to review the filing in advance of the June 2, 2023 hearing.

WHEREFORE, for all of the foregoing reasons, Mr. Meek respectfully asks this Court to extend the deadline for his reply to ECF 60 to no later than noon on May 31, 2023.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document VIA ECF which provides a copy to the AUSA of record.

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